## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Leanna Brown : CHAPTER 13

Debtor

Wells Fargo Bank, N.A.

Leanna Brown

Movant : BANKRUPTCY NO.: 14-19456-jkf

v.

:

Debtor

William C. Miller :

Trustee :

## <u>DEBTOR'S OBJECTION TO MOVANT'S MOTION FOR</u> <u>RELIEF FROM THE AUTOMATIC STAY UNDER § 362(d)</u>

Debtor, by her attorney, Erik B. Jensen, Esq. by way of answer to Movant's motion, respectfully represent that:

1.- 5. Admitted.

6-10. Denied. Movant states a conclusion of law to which no response is required. To the extent that any response is required, Debtor seeks to cure any default in a modified plan post confirmation.

WHEREFORE, Debtor prays that Movant's request be denied.

Date: May 30, 2017 Respectfully submitted,

/S/ Erik B. Jensen Erik B. Jensen, Esq.